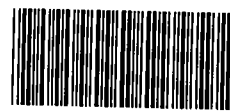


ORIGINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

1650 Arch Street  
Philadelphia, PA 19103  
TOWLE -3HS31



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2 May 2001

Wilmington Economic Development Corp.  
c/o Ms. Constance McCarthy  
100 West 10<sup>th</sup> Street, Suite 706  
Wilmington, DE 19801

re: Electric Hose and Rubber Co.  
12<sup>th</sup> Street Landfill/Dump Site  
Wilmington, Delaware

Dear Ms. McCarthy:

The U.S. Environmental Protection Agency (EPA) is now completing a Time-Critical Removal Action at the 12<sup>th</sup> Street Landfill/Dump Site in Wilmington, Delaware. The Removal Action is conducted pursuant to EPA authorities under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), more commonly known as Superfund. The 12<sup>th</sup> Street Landfill/Dump Site is located along 12<sup>th</sup> Street and the Brandywine Creek immediately west of Interstate 495 in Wilmington, Delaware. The Site and Removal Action were resultant from the erosion of contaminated soil and waste materials from the Site into the Brandywine Creek. The waste materials, consisting primarily of industrial hoses, related debris, drum remains, and lead-contaminated soil, apparently resulted from the adjacent operations of the former Electric Hose and Rubber Company facility. Waste materials and contaminated soil have been identified on properties currently owned by approximately six different entities.

This correspondence is sent to representatives of present day owners of property upon which EPA has identified elevated levels of contamination and/or waste materials, present day owners of portions of the former Electric Hose and Rubber Co. facility, and present day companies linked to the former Electric Hose and Rubber Company. As such, recipient organizations of this correspondence may have potential liability under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund), and similar Delaware environmental Acts or Programs, for costs associated with mitigating threats posed by the Site.

This correspondence invites you to an informational meeting with EPA and the Delaware Department of Natural Resources and Environmental Control (DNREC). The intent of this meeting is to provide each owner of contaminated property with the opportunity to obtain information relating to property contamination, understand potential responsibilities for removal or remediation of the contamination, and participate in any strategy development. A goal of the meeting will be to provide the opportunity to enable potentially affected parties to best understand their potential role in future

12<sup>th</sup> Street Landfill/Dump Site  
Wilmington, Delaware

Sampling and analytical activities conducted by DNREC and EPA in 1999 identified an area of elevated soil and sediment contamination along the bank of the Brandywine Creek. Several hazardous substances were identified in the soil in an area where the remains of drums and industrial hoses were seen protruding from the soil. Historical aerial photographs suggested that the elevated contamination coincided with an area of disturbed ground adjacent to an industrial facility. The facility was the former Electric Hose and Rubber Company which has operated in the area at least since the early 1900's.

Lead concentrations were identified up to 260,000 mg/kg in the soil. Biotoxicity testing also indicated that arsenic and chromium concentrations contributed to environmental risk. Organic compounds identified and attributable to the Site include toluene and bis (2-Ethyhexyl) Phthalate. The waste consisted of large amounts of industrial hoses of various sizes, waste rubber materials, drums containing waste hoses and rags, and pieces of lead and other metal. The EPA On-Scene Coordinator identified some hoses with labels identifying the Electric Hose and Rubber Co.

Based upon high levels of hazardous substances at the Site, EPA initiated a Time-Critical Removal Action in 2000 intending to stabilize the most immediate threats posed by the Site --- erosion of contamination into the Brandywine Creek and exposure of high contamination levels in the surface soil. The Action entailed re-grading the Site to promote drainage and minimize erosion and then covering the contamination with 24 inches of soil material (articulating concrete blocks were placed on the Creek bank). The Action is expected to be completed in the Spring of 2001.

During the course of the Action, additional sampling and analysis indicated that the size of the contaminated area was significantly larger than originally expected. Elevated lead levels were identified on properties located on the north side of 12<sup>th</sup> Street, on properties not within the EPA installed cover, and within sediments of the Brandywine Creek. Sampling and analysis coordinated by DNREC has also identified elevated lead concentrations in the area occupied by the former Electric Hose and Rubber Company facility.

The Electric Hose and Rubber facility ceased operations in the 1970's. Property ownership near the facility has changed several times in the past decades. At this time, more than 6 parcels exhibit contamination, contain waste materials, or contain elevated lead concentrations. Parcels are owned by two Departments with the State of Delaware, a Local Economic Development Corporation, a railroad, and at least 2 other private entities.

The EPA Time-Critical Removal Action did not address all threats posed by the currently anticipated area of contamination. Current sampling and analysis may not fully characterize the area of contamination or potential threats. The Site may be addressed under Federal or State authorities.